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UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

July 10, 2018

David J. Bradley, Clerk of Court

United States of America

v.

Kameron Lafleur
Jaimian Rashaad Sims

Case No.

4:18mj1080

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 1, 2017 - March 10, 2018 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 U.S.C. § 1594 (c), 1591(a)(1),
(b)(1) and (b)(2)

Offense Description

Conspiracy to Commit Sex Trafficking, Sex Trafficking by Force, Fraud or
Coercion and Sex Trafficking of Minors.

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

Donnita Clark Gordon
Complainant's signature

Donnita Clark Gordon, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: July 10, 2018City and state: Houston, Texas

Dena Palermo
Judge's signature

Dena Hanovice Palermo, USMJ

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Donnita Gordon, being duly sworn, hereby depose and state the following:

1. I am a Special Agent, employed by the Federal Bureau of Investigation, assigned to the Houston Division. I have been with the Federal Bureau of Investigation for 28 years. I am charged with the duty of investigating violations of the law of the United States, collecting evidence in cases in which the United States is or may be a party in interest, and performing other duties imposed by law. During my employment with the Federal Bureau of Investigation, I have investigated a number of cases that involved the exploitation of children. Additionally, I participated in the execution of search warrants for documents and other evidence, including computers and electronic media, in cases that involved the sexual exploitation of children. I have also participated in various Texas Department of Public Safety mandated and volunteer training for the investigation and enforcement of state and federal child exploitation laws.
2. This Affidavit is made in support of a criminal complaint charging “KAM” KAMERON LAFLEUR, Date of Birth (DOB) 8/ /1996 and “SAUCE LEAN” JAIMIAN RASHAAD SIMS, DOB 7/1/1992 with violating 18 U.S.C. § 1591(a)(1) and (a)(2), (b)(2) which makes it a crime for someone who benefits, financially, or by receiving anything of value, knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act. Title 18 U.S.C. § 1594 (c), 1591(a)(1) , (b)(1) and (b)(2) which makes it a crime to conspire to commit Sex trafficking by force, fraud, coercion or that the person has not attained 18 years of age.

3. I am familiar with the information contained in the Affidavit based upon the investigation I have personally conducted, and any of my conversations with other parties involved in this case.
4. Because the Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation, I have set forth only those facts that I believe are necessary to establish probable cause that evidence of a violation of 18 U.S.C. 1591, and 1594 have been committed by Lafleur and Sims starting on or about August 1, 2017 through March 10, 2018. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.
5. Your Affiant learned by speaking with Special Agent (SA) Theo Williams and Task Force Officer (TFO), David Nieto, Houston Police Department (HPD) that on August 9, 2017, TFO Nieto was in contact with a Victim Advocate who was concerned about Minor Victim (MV) 2 (DOB 10/11/2001) who had run away from a shelter form victims of sex trafficking. TFO Neito was advised that MV2 would be likely be working the track off of Bissonnett, an area known for prostitution activity. Along with HPD Patrol, TFO Nieto came in contact with MV2 who was walking with another female. MV2 would not disclose who her "pimp" was but did say that he associates with "Sauce Walka." "Sauce Walka" is known to law enforcement as Albert Walker Mondane, DOB 6/ /1990. Walker and Sims are principal leaders of a documented gang known as "The Sauce Factory" (TSF). In addition to their gang activities, TSF is a known rap group with an online presence and following. TSF's music content is predominantly comprised of lyrics which depict drug use, gun violence and the promotion of sex trafficking. MV2

was charged with failure to ID and arrested. She was taken to the juvenile detention center and stayed there for a while.

6. The next day MV2 was interviewed at the Children's Assessment Center. TFO Nieto was present during the interview. MV2 still would not name her pimp but explained how she was involved with the group known to law enforcement as TSF. MV2 was ultimately released back to the shelter. TFOs Nieto and SA Williams followed up with MV2 while she was at the shelter.
7. During the second interview MV2 was able to identify the owner of a gentlemen's club where she was trafficked out of. Before they could return for follow up, MV2 ran away again.
8. After MV2 ran away from the shelter for the second time around October 6, 2017, MV2 was then seen posting provocative images on social media, leading law enforcement to believe she was engaging in commercial sex. On January 5, 2018, a sting was conducted at Bucks Wild Adult Entertainment club at 410 N. Sam Houston Parkway E., Houston, Texas. MV2 was arrested for agreeing to perform a sex act on an undercover officer. Law enforcement (HPD) learned she was 16 years old and placed her in custody and had a SANE exam done. MV2 was interviewed by Deputy Teresita Castro, Harris County Constable's Office, pct. 4, and TFO Nieto. MV2 confirmed she ran away from the shelter by hitch hiking halfway to her destination. Then MV2 was picked up by a member of TSF whose identity she would not reveal at that time. She was taken to a Hilton (believed to be the one located downtown). MV2 was with two girls from the shelter.

One girl went off on her own. The other, believed to be a particular minor female known to law enforcement, went with MV2 to the Hilton but was dismissed by the

unidentified TSF member. MV2 stayed with the TSF members for a few days in various downtown hotels.

9. The unidentified TSF members were afraid to work her as a prostitute due to her age and because she did not have fake adult ID which could be used to put her in the gentlemen's clubs. Shortly thereafter, MV2 starts working for Sims performing commercial sex acts. MV2 does not earn a great deal of money at this time. Due to her lack of earnings Sims gave MV2 to Lafleur. Not long after being given to Lafleur, MV2 stated she was contacted by someone using Bucks Wild Instagram account offering her a job as a dancer. MV2 worked dates from on-line posts and gave all of her earnings to Lafleur and continued to do so when MV2 transitioned to the position at Bucks Wild.
10. When MV2 went to Bucks Wild she met with an unidentified manager and auditioned for him. He approved but when MV2 could not show him identification he offered her the use of the adult identification of a former employee. MV2 worked there from November 2017 until her arrest in January of 2018. MV2 told HPD that she paid the manager a club fee. MV2 stated she engaged in commercial sex acts while at Bucks Wild and all her earnings, besides the club fee, when to Lafleur. MV2 indicated that there were cameras in the VIP room that would have allowed management to see that commercial sex was occurring inside the club. During this time, MV2 and Lafleur were living together in an apartment off Westheimer. This location has been identified in open search records of Lafleur and MV2 when confronted confirmed this address.
11. Sims saw how much money MV2 was making working for Lafleur and asked MV2 to "Choose Up" with him. This term is known within the law enforcement and sex trafficking worlds to mean picking the pimp for whom a girl is going to work. MV2 knew

Gary Shawn Haynes, Jr., DOB 5/17/1996, and Kendra Kimball DOB, 11/11/1994, from when they would visit the apartment she shared with Lafleur. MV2 refused Sims and stayed with Lafleur.

12. MV2 reported that Lafleur would beat her out of frustration. If she showed any anxiety, Lafleur would choke her, punch her, slap her and throw objects at her.
13. MV2 in describing the hierarchy of TSF, stated Sims was the boss of the “crash dummies” who are considered the lesser or newer pimps. She said Lafleur and Haynes, Jr., were some of the “crash dummies.” MV2 was aware that the money went up the chain though she never saw her pimp pay up the line. MV2 knows the higher ups do not recruit new girls or work kids and they have their own longtime girls.
14. On March 10, 2018, a federal search warrant was executed at “The Mansion” located at 5671 Grand Floral Blvd., Houston, Texas. “The Mansion” is a private home known to be used by members of the Sauce Factory based on law enforcement and information from multiple individuals. At that time, Jaimian Sims, Miles Smith, Albert Walker Mondane “Sauce Walka”, Randarius Jaroy Ray, “Rizzo” Michael Cordell Henry “Sancho Saucy”, Deszmann Broussard “Lucciani Saucy”, Anya Wright “Anistasia”, Shawnee Elizabeth Burke “Austyn Monroe” who were found at the residence.

CONCLUSION

15. Based upon the information set forth above, I believe that probable cause exists for the issuance of a Criminal Complaint charging KAMERON LAFLEUR and JAIMIAN SIMS with violation of 18 U.S.C. § 1594 (c), 1591(a)(1) , (b)(1) and (b)(2), which makes it a crime for someone who conspires, benefits financially, or by receiving anything of value, knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud,

coercion, or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act.

Donnita Gordon

Affiant, Donnita Gordon

Signed and sworn to before me this the 10th day of July, 2018.

Dena Palermo

Dena Hanovice Palermo

United States Magistrate Judge